

**Opposition Date: October 14, 2014 at 11:59 p.m. (Prevailing Eastern Time)**  
**Reply Date: October 21, 2014 at 11:59 p.m. (Prevailing Eastern Time)**

**JONES DAY**

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*Attorneys for the Debtors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	:	<b>Chapter 11</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.</b>	:	<b>Case No. 08-13555 (SCC)</b>
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>

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**DECLARATION OF LAURA W. SAWYER IN SUPPORT OF LEHMAN'S MOTION  
FOR AN ORDER EXCLUDING THE TESTIMONY OF  
DANIEL CURRY AND JEFFREY HASTEROK**

I, Laura W. Sawyer, declare that the following is true and correct to the best of my knowledge, information and belief:

1. I am an attorney with the law firm Jones Day, counsel to Debtors in the above-captioned case, and I respectfully submit this declaration in support of Lehman's Motion for an Order Excluding the Testimony of Daniel Curry and Jeffrey Hasterok, dated September 26, 2014.

2. Attached to this declaration as Exhibit 1 is a true and correct copy of the Reserve Fund Agreement, dated November 5, 2002, by and among the Washington State Tobacco Settlement Authority ("Washington TSA"), as Issuer, U.S. Bank, N.A. ("U.S. Bank"), as

Trustee, and Lehman Brothers Special Financing Inc. (“LBSF”), together with the Amendment Agreement, dated March 26, 2003, among Washington TSA, U.S. Bank, and LBSF.

3. Attached as Exhibit 2 to this declaration is a true and correct copy of the Expert Witness Valuation Report of Daniel Curry and Jeffrey Hasterok, dated December 16, 2013.

4. Attached as Exhibit 3 to this declaration is a true and correct copy of the deposition transcript of Jeffrey Hasterok, dated January 16, 2014.

5. Attached as Exhibit 4 to this declaration is a true and correct copy of the deposition transcript of Daniel Curry, dated January 17, 2014.

6. Attached as Exhibit 5 to this declaration is a true and correct copy of expert disclosure of Peter Shapiro, dated December 16, 2013.

7. Attached as Exhibit 6 to this declaration is a true and correct copy of the deposition transcript of Peter Shapiro, dated March 5, 2014.

8. Attached as Exhibit 7 to this declaration is a true and correct copy of the deposition transcript of Peter Shapiro, dated December 13, 2013.

9. Attached as Exhibit 8 to this declaration is a true and correct copy of the Expert Rebuttal Report to LBSF/LBHI Expert Witness Reports and Testimony of Daniel Curry and Jeffrey Hasterok, dated March 24, 2014.

10. Attached as Exhibit 9 to this declaration is a true and correct copy of the deposition transcript of Robert Cook, as a 30(b)(6) witness, dated December 16, 2013.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true  
and correct.

Dated: September 26, 2014  
New York, New York

/s/ Laura W. Sawyer

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JONES DAY

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**DECLARATION OF SERVICE**

Laura W. Sawyer declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that on September 26, 2014, I caused a true and correct copy of the attached Declaration Of Laura W. Sawyer In Support Of Lehman's Motion For An Order Excluding The Testimony Of Daniel Curry and Jeffrey Hasterok to be served by first class mail and via the Southern District of New York Bankruptcy Court's electronic case filing system upon the following counsel of record:

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/s/ Laura W. Sawyer  
Laura W. Sawyer